

EXHIBIT A

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IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI DADE COUNTY, FLORIDA

NORMA MATEO,

CASE NO.:

Plaintiff,

vs.

TARGET CORPORATION, a
Foreign Profit Corporation

Defendant.

COMPLAINT

COMES NOW the Plaintiff, NORMA MATEO, by and through her undersigned attorneys, and sues the Defendant, TARGET CORPORATION, and alleges the following:

1. This is an action in excess of THIRTY THOUSAND (\$30,000.00) DOLLARS, the minimal jurisdictional limits of this Court.
2. At all times material hereto, the Plaintiff, NORMA MATEO, was as is a resident of Miami-Dade County, Florida, is over the age of eighteen (18) years, and in all other respects is sui juris.
3. At all times material hereto, the Defendant, TARGET CORPORATION, was and is a Foreign Profit Corporation, and licensed to do and doing business in Miami-Dade County, Florida.
4. At all times material hereto, the Defendant, TARGET CORPORATION, owned, operated, controlled, and possessed Target #1038 located at 14075 Biscayne Blvd., North Miami Beach, FL 33181.
5. At all times material hereto, the Plaintiff, TARGET CORPORATION, was a business invitee at Target #1038 located at 14075 Biscayne Blvd., North Miami Beach, FL 33181.

COUNT I NEGLIGENCE AGAINST TARGET CORPORATION

The Plaintiff realleges paragraphs one (1) through five (5) above as if fully set forth herein and further states:

6. On February 3, 2020, Plaintiff, NORMA MATEO, was struck by a "U-boat" while on Defendant's, TARGET CORPORATION, premises. Defendant, TARGET CORPORATION, and their employees are responsible for the "U-boats" on their premises.
7. At all times material hereto, the Defendant, TARGET CORPORATION, had a duty to maintain the "U-boats" and its premises in a reasonably safe condition and/or perform inspections on the property so as to prevent injury to invitees, and in particular to the Plaintiff, NORMA MATEO.
8. Defendant, TARGET CORPORATION, was aware or should have been aware of the harm a "U-boat" could cause and as such had prior knowledge of the dangerous propensity of it.
9. At all times material hereto, the Defendant, TARGET CORPORATION, through its employees and/or personnel, breached its duties, including but not limited to:
 - a. Failing to maintain the premises in a reasonably safe condition so as to prevent injury to individuals, specifically the Plaintiff, NORMA MATEO, to wit: FAILING TO PROVIDE A SAFE ENVIRONMENT FREE OF HAZARDOUS AND POTENTIAL DANGEROUS CONDITIONS;
 - b. Failing to perform routine inspections on the property to prevent and/or repair such dangerous conditions.
 - c. Failing to properly train its personnel and employees on how to maintain a reasonably safe environment;
 - d. Failing to take safety measures and rectify the dangerous condition upon knowledge of same.

10. As a direct and proximate result of the aforementioned negligence of the Defendant, TARGET CORPORATION, the Plaintiff, NORMA MATEO, has suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money, and aggravation of a previously existing condition. The losses are either permanent or continuing and the Plaintiff will suffer the losses in the future.

11. In that the injuries suffered by the Plaintiff, NORMA MATEO, are continuing in nature, she will continue to suffer pain, loss of wagers, physical handicap and permanent injury in the future and will be further compelled to expend great sums for medical care and related treatment for those injuries.

WHEREFORE, the Plaintiff, NORMA MATEO, sues the Defendant, TARGET CORPORATION, and demands judgment for damages and any and all such relief as this Honorable Court may deem proper, and further, the Plaintiff, NORMA MATEO, demands a trial by jury on all issues so triable as of right.

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